

# **EXHIBIT B**

**Larson, J.T.**

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**From:** Larson, J.T.  
**Sent:** Thursday, November 19, 2020 4:04 PM  
**To:** 'André Rouviere'; Jodi Rouviere  
**Cc:** Asfendis, Paul E.; Eaton, Joe  
**Subject:** RE: [EXTERNAL]Rouviere v Depuy

Andre:

There is absolutely no reason to conduct any such discovery regarding Dr. Medlin's prior testimony for DePuy. At the time you disclosed Dr. Medlin as one of your expert witnesses, you were aware that he had testified at trial and deposition on behalf of DePuy on several occasions and had been retained in several cases in the past by our firm. Plaintiffs' Rule 26 Disclosures served on September 18, 2020 confirm that you were aware. If you file a motion seeking unnecessary and frivolous discovery, we will oppose the motion and seek to recover costs and fees incurred as a result.

J.T.

**J.T. Larson**

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**From:** André Rouviere <andre@rouvierelawfirm.com>

**Sent:** Thursday, November 19, 2020 12:08 PM

**To:** Larson, J.T. <jt.larson@btlaw.com>; Eaton, Joe <Joe.Eaton@btlaw.com>; Jodi Rouviere <jodi.jtm@gmail.com>; Asfendis, Paul E. <PAsfendis@gibbonslaw.com>

**Subject:** [EXTERNAL]Rouviere v Depuy

JT:

In light of the recent disclosure by DePuy of the relationship between Dr. Medlin, DePuy and its counsel, I will request leave of the Court to conduct limited discovery to determine the scope and length of that relationship and nature of any potential conflict as DePuy seeks to bind Plaintiffs to a disqualified expert's opinion concerning DePuy. Obviously DePuy was well aware of its relationship with Dr. Medlin and choose not to disclose this relationship until November 13, 2020. Please advise if you object and if so time to meet and confer today.

**Andre A. Rouviere, Esquire**

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